

Anti-Trafficking Compliance Plan

Sierra Leone

Background and Purpose

IPA Sierra Leone has developed this Anti-Trafficking Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero-tolerance policy regarding trafficking of persons by government contractors and award recipients, as set out in FAR Subpart 22.17 and 52.222-50(h) and in USAID Standard Provision for U.S. Nongovernmental Organizations (“Anti-Trafficking Requirements”).

The purpose of this Plan is to set out IPA’s policies and procedures for (1) making IPA employees aware of the conduct prohibited under the IPA policy and the Anti-Trafficking Requirements and the actions that may be taken against employees for violations; (2) employing fair recruitment, wage and housing practices; and (3) preventing prohibited trafficking activities by employees, suppliers, subcontractors and subrecipients, and monitoring, detecting and terminating those who engage in such activities.

Applicability

The Plan applies to all personnel working at IPA Sierra Leone and related contractors, consultants, suppliers, subcontractors, subrecipients, and their employees and agents.

Employee Awareness Program

IPA has adopted a policy on Combating Trafficking in Persons (“Policy”) that reflects the Anti-Trafficking Requirements prohibiting trafficking-related activities, describes the actions IPA may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating violations. The Policy is posted on IPA’s website where it can be accessed by all IPA personnel at any time. The Policy’s adoption and subsequent revisions will be announced in company-wide emails containing a link to the Policy on the website with instructions to access and review it. IPA will also send out periodic emails, typically annually, reminding IPA staff to regularly review the Policy and

stay up to date on its contents. IPA will develop a training on the Policy and will require all current IPA personnel to complete the training. All newly hired personnel will be required to read and acknowledge the Policy, and to complete the training on the Policy at the time of hire.

IPA may also conduct specialized training on the Anti-Trafficking Requirements, the Policy and the Plan on an as-needed basis.

Recruitment and Wage Plan

IPA prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. IPA staff must fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wage and benefits, work location, significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

IPA prohibits the use of recruiters that do not have trained employees, or that do not comply with all employment/labor laws of the country where the recruitment takes place.

IPA prohibits charging recruiting fees to any employee.

IPA will pay all employees wages that meet applicable host-country legal requirements, Where required by law or contract, IPA will provide to every employee an employment contract, recruitment agreement or other required work document, written in a language the employee understands, containing all required information about the terms and conditions of employment, which may include, by way of example, the work description, wages, work location, living accommodations and associated costs, time off, transportation arrangements, grievance process, the content of applicable laws and regulations prohibiting trafficking in persons, and the prohibition on recruitment fees. If the employee must relocate to perform the work, IPA will provide the required work document at least five (5) days prior to relocation.

IPA prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.

IPA will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by IPA for purposes of working on a covered US Government contract or award.

IPA will provide or pay the cost of return transportation at the end of employment for any employee who is not a Sierra Leone national and was brought into Sierra Leone for purposes of working for IPA Sierra Leone.

Housing Plan

In situations where IPA provides housing to employees, the housing will at minimum meet host country housing and safety standards.

Supplier Compliance

IPA requires all contractors, consultants, vendors, suppliers, subcontractors and subrecipients (“Suppliers”) providing goods or services under Covered Agreements to comply with the Policy and this Plan (or applicable modified compliance plan), and will include language to that effect in all Supplier Agreements. Where applicable, IPA will also flow down FAR 52.222-50, FAR 52.222-56, or USAID Standard Provisions to Supplier Agreements. The Policy and this Plan will be provided to all Suppliers.

IPA requires all Suppliers to have a written compliance plan to prevent prohibited trafficking-related activities and to monitor, detect and terminate any of Suppliers’ employees, contractors, consultants, suppliers, subcontractors or subrecipients engaging in prohibited trafficking-related activities, and provide a copy of its plan to IPA. The Supplier’s compliance plan must meet the Anti-Trafficking Requirements and be appropriate to the size and complexity of its Supplier Agreement with IPA and the nature of the activities to be performed under it.

IPA requires all Suppliers to submit written certification to IPA, prior to the award of any Supplier Contract, and on an annual basis thereafter, certifying that:

The Supplier has implemented a compliance plan and has complied with its plan; and

After conducting due diligence, to the best of the Supplier’s knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, subrecipients or their employees, have engaged in any prohibited trafficking related activities, or, if any abuses relating to prohibited trafficking related activities have been found, Supplier has taken appropriate remedial and referral actions.

IPA will review the compliance plans and certifications of its Suppliers in order to ensure the plans include adequate procedures and reporting mechanisms. For Supplier Contracts that may be more susceptible to trafficking-related activities, IPA may, where it has direct access, inspect the Supplier's workplace, or any housing provided by the Supplier for signs of trafficking-related activities.

If any Supplier fails to comply with the Policy or applicable Anti-Trafficking Requirements, IPA will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the Supplier to remove an employee or agent from a project
- Requiring the Supplier to terminate its relationship with any Supplier contractor, consultant, supplier, subcontractor or subrecipient
- Suspending payments to Supplier until violation is remedied
- Immediately terminating the Supplier contract or award

Reporting Requirements and Procedure

All IPA staff, Suppliers and Supplier employees, consultants, volunteers, and agents ("Supplier Personnel") are required to report any suspected trafficking-related activity or violations of the Policy to IPA. Reports may be made via IPA's anonymous whistleblower hotline: +1-844-837-5445 or www.lighthouse-services.com/poverty-action.

In addition, reports may be made to any member of the IPA Senior Management Team, Country Director/Country Representative, or any member of the IPA Legal Department. Anyone who receives such a report is required to immediately forward the report to the IPA General Counsel/ Chief Compliance Officer.

All IPA Staff, Suppliers and Supplier Personnel may also report any suspected trafficking related activity or violation of this policy to the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org

IPA Staff, Suppliers and Supplier Personnel who believe they or others have been subjected to prohibited trafficking-related activities may report the activity as outlined above.

The General Counsel/ Chief Compliance Officer will ensure that all reports of prohibited trafficking-related activity or violations of the Policy are investigated and that appropriate action is taken.

IPA strictly prohibits retaliation against any IPA employee who in good faith reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. IPA employees who engage in any form of retaliation against those who in good faith report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment with IPA.

Investigations

If IPA receives credible information alleging prohibited trafficking related activity, the General Counsel/ Chief Compliance Officer will ensure that an investigation is undertaken, that the findings, and what, if any, appropriate remedial action was taken, is reported.

The General Counsel/ Chief Compliance Officer will be responsible for immediately notifying the contracting officer and the appropriate agency Inspector General of the information received and any remedial action taken.

IPA will cooperate fully with any U.S. Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including but not limited to, providing timely and complete responses to document requests, and providing reasonable access to IPA facilities and staff.

IPA will protect all employees suspected of being victims or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and will not prevent or hinder those employees from cooperating fully with U.S. Government authorities.

Posting

IPA will post this Compliance Plan on its external website. IPA will also post this Compliance Plan at all Sierra Leone workplaces, except where the work is being performed in the field or not otherwise at a fixed location.